

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas

ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

**[PROPOSED] ORDER ON AFFILIATE DEFENDANTS' SECOND AND RENEWED
MOTION TO COMPEL THE STATE OF TEXAS**

Before the Court is Defendants Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.’s (collectively, “Affiliate Defendants”) Second and Renewed Motion To Compel the State of Texas, filed on October 20, 2022. After considering the Affiliate Defendants’ Second and Renewed Motion To Compel the State of Texas (“the Motion”),

any Response, and the Record, the Court concludes that the Motion is meritorious and should be granted.

It therefore is **ORDERED** that the Motion is **GRANTED**.

It is further **ORDERED** that:

(1) Texas is to respond as to Affiliate Defendants' Interrogatories 4-7, 9, 14, 15, and substantially complete its production of documents responsive to Requests for Production 3, 4, 6, 9-13, 15-18, 24, 33-35, 37-39, and 41-43 within seven (7) days of this order; and

(2) Texas is to search the custodial data of David Maxwell and produce within ten (10) days of this order all responsive and non-privileged documents that it is currently withholding on the basis of the Medicaid investigative and common interest privileges.

Signed this _____ day of _____, 2022.

Judge, Presiding